

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

June 18, 2020

Via Email

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In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Chris & Nicole:

We write in response to your letter of earlier this morning, responding to correspondence from our co-counsel Robert Haefele and Sean Carter of June 16, 2020 regarding the current actions pending against Sudan. As indicated in those exchanges, the *Ashton* plaintiffs intend to amend their complaint, *Ashton et al. v. Republic of Sudan*, 02 CV 6977 (GBD)(SN), which has already been consolidated in the 9/11 MDL, 03 MDL 1570 (GBD)(SN).

We understand that after several meet & confer exchanges, you object to any plaintiff's right to amend their complaint after the passage of time, while ignoring new developments and the defaults entered against your client Sudan. We will therefore file a motion to amend and/or join in the motion to amend that our co-counsel intend to file. We also agree with them and with you, that despite having a separate complaint, as is the case against the Kingdom of Saudi Arabia, we should have coordinated motion practice and the inevitable discovery that may follow.

We note you have filed an appearance and moved in only the *O'Neil* action, and have not appeared in *Ashton* or any of the other cases against Sudan in the 9/11 MDL, despite our extensive communication concerning these suits. Please correct me if I am wrong, but it appears that your client has declined to authorize you to accept service for Sudan in *Ashton* and the other cases. We will therefore act accordingly.

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Regards,

KREINDLER & KREINDLER

/s/ James P. Kreindler

James P. Kreindler, Esquire
Andrew J. Maloney, Esquire
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for Personal Injury and Death Claims